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PLEASE REPLY TO
ATLANTIC COUNTY OFFICE

December 6, 2018

The Honorable Magistrate Judge Ann Marie Donio
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Court Room: 3B
Camden, NJ 08101

Re: The Estate of Joey Myers and Carolyn K. Chaudry, as
Administrator Ad Prosequendum of the Estate of Joey Myers,
and in her own right v. The City of Millville, Chief Jody
Farabella, individually and his official capacity, Officer
Michael Calchi, Officer Gavin Phillips, Officer Jeffrey
Proffit, and John Doe Police Officers 1-10, individually and
in their official capacities
Docket Number: 17-cv-01411 JHR/AMD

Dear Magistrate Judge Donio:

On or about November 20, 2018, our office filed a letter
requesting an extension in the pretrial factual discovery. On or
about November 21, 2018, a scheduling order was entered in this
case with pretrial factual discovery to be concluded by December
31, 2018.

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December 6, 2018

The Honorable Magistrate Judge Ann Marie Donio

Re: The Estate of Joey Myers and Carolyn K. Chaudry, as Administrator Ad Prosequendum of the Estate of Joey Myers, and in her own right v. The City of Millville, Chief Jody Farabella, individually and his official capacity, Officer Michael Calchi, Officer Gavin Phillips, Officer Jeffrey Proffit, and John Doe Police Officers 1-10, individually and in their official capacities
Docket Number: 17-cv-01411 JHR/AMD

If the previous letter our office failed to include an extension request on expert reports.

The new discovery deadline is now December 31, 2018, so all other deadlines should be extended by thirty (30) days.

We have consent from Plaintiff's counsel Hillary Nappi and attached a Proposed Order.

Respectfully submitted

BARKER, GELFAND, JAMES & SARVAS
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